

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO

IN RE:)	CASE NO. 20-40457
)	
BRIDGET L. RANKIN)	CHAPTER 7
BRADLEY A. RANKIN)	
)	JUDGE THARA N.A. PATTON
)	
Debtor(s))	APPLICATION FOR APPOINTMENT OF SPECIAL COUNSEL FOR TRUSTEE

Michael D. Buzulencia states that he is the Trustee herein and that he wishes to employ, Mark E. Berns and the law firm of OnderLaw, LLC, as Special Counsel in the above proceedings; and Mark E. Berns has been approved by bankruptcy court to appear Pro Hac Vice on October 23, 2020; and that it is necessary to employ an Attorney because in the proper performance of his duties as required by the Bankruptcy Code, services of Mark E. Berns and the law firm of OnderLaw, LLC, have knowledge of debtor's Bridge L. Rankin's personal injury claim, where Trustee needs representation; and to the best of his knowledge, Mark E. Berns and the law firm of OnderLaw, LLC represented the debtor Bridget L. Rankin in the personal injury claim to be pursued herein pre-petition; that Mark E. Berns and the law firm of OnderLaw, LLC are knowledgeable in debtor Bridget L. Rankin's personal injury claim, have no connection with the creditors, or any other party in that the professional services they are to render consist of:

- (a) preparation of pleadings and representation;
- (b) preparation of other pleadings and applications incidental to the administration of the claim indicated below;
- (c) bringing or defending any proceeding necessary in the below matter;
- (d) attending any court hearings related to the above matters;
- (e) represent the Trustee in a personal injury claim of debtor Bridget L. Rankin due to Roundup exposure;

- (f) any other matters for which it would be appropriate for counsel to perform in this matter to assist the administration of the estate.
- (g) The normal fee that Mark E. Berns and the law firm of OnderLaw, LLC are compensated in cases of this matter is 40% contingency after expenses subject to court's approval.

WHEREFORE, Michael D. Buzulencia moves for the appointment of Mark E. Berns and the law firm of OnderLaw, LLC, Special Counsel herein.

/s/Michael D. Buzulencia

Michael D. Buzulencia, Chapter 7 Trustee
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OHIO BAR REG. NO. 0015291

CERTIFICATE OF SERVICE

I certify that on the 3rd day of November, 2020 a true and correct copy of the Application For Appointment of Special Counsel For Trustee was served:

Via the Court's electronic case filing system on these entities and individuals who are listed on the Court's electronic mail notice list:

United States Trustee (Registered address) @usdoj.gov

Rick S. Pluma, Attorney for Debtor at rpluma@ohiolegalclinic.com

And by regular U. S. Mail, postage prepaid to:

Bridget L. Rankin
Bradley A. Rankin
3232 North Park Avenue Ext.
Warren, OH 44481

Mark E. Berns, Esq.
OnderLaw, LLC
110 East Lockwood
St. Louis, MO 63119

/s/Michael D. Buzulencia

Michael D. Buzulencia, Chapter 7 Trustee